



Comcast Corporation
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October 23, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Rural Call Completion*, WC Docket No. 13-39

Dear Ms. Dortch:

On October 21, 2013, Andrew Fisher, Robert Munoz, and the undersigned of Comcast Corporation ("Comcast") met separately with Nicholas Degani, Office of Commissioner Pai; Priscilla Argeris and Christianna Lewis Barnhart, Office of Commissioner Rosenworcel; and Rebekah Goodheart, Office of Chairwoman Clyburn, Travis Litman, Wireline Competition Bureau and Christopher Killion, Enforcement Bureau. The purpose of the meetings was to discuss Comcast's positions in the above-captioned proceeding, which are reflected in its filings in the docket.

In particular, Comcast stated that the call detail identified in the Notice of Proposed Rulemaking¹ is commercially and competitively sensitive and, if collected, should be treated as presumptively confidential. Comcast also emphasized that the Commission should employ metrics that are designed to properly measure the ability of networks to deliver calls to the terminating location and exclude calls that are not relevant to an assessment of a carrier's call completion performance. For that reason, Comcast explained that the Network Effectiveness Ratio ("NER") is a more accurate measure of network performance than the Answer Seizure Ratio ("ASR"). Comcast also cautioned against the use of sample sizes that are too small to provide a reliable snapshot of a service provider's performance in completing calls to a particular rural exchange.

Finally, Comcast explained that a service problem may occur in any segment of the call path, from the point of origination to the point of termination. As a result, Comcast expressed support for adoption of the limited reporting obligations for terminating carriers detailed in Comcast's comments. Comcast also urged the Commission to require all rural local exchange carriers to make a test line available to allow providers to routinely and proactively test the quality of their routes to rural termination points.

¹ *Rural Call Completion*, Notice of Proposed Rulemaking, 28 FCC Rcd 1569 (2013).

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceeding.

Respectfully submitted,

/s/ Mary McManus

Mary McManus

cc: Priscilla Argeris
Christianna Lewis Barnhart
Nicholas Degani
Rebekah Goodheart
Christopher Killion
Travis Litman